

EXHIBIT “A”

James A. Maroules, Esq. ID #261032018
AGRAPIDIS & MAROULES, P.C.
777 Terrace Avenue - Suite 504
Hasbrouck Heights, New Jersey 07604
(201) 288-0500
ATTORNEYS FOR PLAINTIFF

Jovanka Peguero,
Plaintiff,

V.

Stop & Shop,
AND JOHN DOE I-III,
Defendants.

:
:SUPERIOR COURT OF NEW JERSEY
:LAW DIVISION: HUDSON COUNTY
:DOCKET NO.: HUD-L-

:
: CIVIL ACTION
:
:
:
:
:

COMPLAINT AND JURY DEMAND

Plaintiff, Jovanka Peguero, residing in the City of Jersey City, in the County of Hudson, and State of New Jersey, by way of Complaint against the defendants, hereby alleges and says:

FIRST COUNT

1. At all times hereinafter mentioned, plaintiff, Jovanka Peguero, was a lawful invitee on premises located at 232 Central Avenue in the City of Jersey City, County of Hudson, and State of New Jersey on October 11, 2019 at approximately 8:30 a.m.

2. Upon information and belief, plaintiff, Jovanka Peguero, fell due to a dangerous and hazardous condition, to wit, slipped and fell on breadcrumbs on the property of Stop and Shop, located at 232 Central Avenue in the City of Jersey City, County of Hudson, and State of New Jersey on October 11, 2019 at approximately 8:30 a.m.

3. Upon information and belief, defendant, Stop & Shop, is responsible for maintenance and management of the premises located at 232 Central Avenue in the City of Jersey City, County of Hudson, and State of New Jersey. The defendant is believed to be the owner of that property.

4. Upon information and belief, defendant, Stop & Shop, is responsible for the maintenance and management of the premises located at 232 Central Avenue in the City of Jersey City, County of Hudson, and State of New Jersey. The defendant is believed to be the lessee of that property and/or owner of that property.

5. Upon information and belief, and in the alternative to the allegations in paragraphs 2, 3 & 4 above, the true name of capacity, whether individual, plural, corporate, partnership, associate or otherwise of defendants, JOHN DOE I-III, are unknown to plaintiff, who, therefore, brings suit against said defendant by such fictitious name. JOHN DOE I-III may be the true owner or operator or party responsible for the maintenance of the property located at 232 Central Avenue in the City of Jersey City, County of Hudson, and State of New Jersey on October 11, 2019, and is responsible for any dangerous conditions on the premises, for the maintenance and repair of the premises and well-being of plaintiff, Jovanka Peguero, but the full extent of those facts linking the fictitiously designated defendants with the cause of action alleged herein is unknown to plaintiff at this time.

6. As a direct and proximate result of the negligence of the defendants, Stop & Shop and John Doe I-III, its agents, servants, and/or employees, in the manner in which said premises were maintained and cleaned, the plaintiff, Jovanka Peguero, was caused to fall and sustain serious injury causing her to suffer great pain and will in the future be caused to suffer great pain; she was caused to incur medical expenses and will in the future be caused to incur medical expenses; she was caused to suffer permanent injury.

7. Upon information and belief, defendants had actual and/or constructive notice of the dangerous condition described above and failed to remedy this dangerous condition, take precautionary steps to prevent the accident, or give notice to those in the area thereby breaching their duty of care to plaintiff.

WHEREFORE, the plaintiff, Jovanka Peguero, demands judgment against the defendants, Stop & Shop and John Doe I-III, jointly and severally for damages, pain and suffering and infliction of emotional distress, together with attorney's fees, interest, costs of

suit and any other relief the Court deems just and equitable.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 

JAMES A. MAROULES, ESQ.

DATED: October 4, 2021

DEMAND FOR TRIAL BY JURY

Plaintiffs hereby demand a trial by jury as to all issues raised in the Complaint.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 

JAMES A. MAROULES, ESQ.

DATED: October 4, 2021

DESIGNATION OF TRIAL COUNSEL

Pursuant to R. 4:25-4, James A. Maroules, Esq., ID #261032018 is hereby designated as Trial Counsel of this matter.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 

JAMES A. MAROULES, ESQ.

DATED: October 4, 2021

CERTIFICATION

I certify that pursuant to R. 4:5-1, to my knowledge and based on the information available to me at this time, the matter in controversy is not the subject of any other action pending in any Court, or of a pending arbitration proceeding and that no additional parties are known at this time who should be added.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 

JAMES A. MAROULES, ESQ

DATED: October 4, 2021

DEMAND FOR ANSWERS TO INTERROGATORIES

Pursuant to R. 4:17-1(b), the plaintiff hereby demands that the defendant provide answers to the Uniform Interrogatories set forth in Form C and C(2) of Appendix II of the Rules Governing the Courts of the State of New Jersey.

AGRAPIDIS & MAROULES, P.C.
Attorneys for Plaintiff

BY: 

JAMES A. MAROULES, ESQ

DATED: October 4, 2021